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April 3, 2017

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Via Certified Mail - Return Receipt Requested

Mr. Ed Galligan
Executive Director
Port of Olympia
915 Washington Street Northeast
Olympia, WA 98501

APR - 6 2017

ORC

EPA Region 10
Office of the Regional Administrator

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION
PLAN**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 9281, Covington, WA 98042, (206) 849-5927. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Waste Action Project's intent to file a citizen suit against the Port of Olympia under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations at the Port of Olympia Ocean Terminal described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Port of Olympia's National Pollution Discharge Elimination System ("NPDES") permit.

For its Ocean Terminal, the Port of Olympia was granted coverage on January 1, 2010 under the Washington Industrial Stormwater General Permit ("IGSP") issued by the Washington State Department of Ecology ("Ecology") on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and set to expire on January 1, 2015, under NPDES Permit No. WAR001168 (the "2010 Permit"). Ecology granted subsequent coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019 (the "2015 Permit") and maintains the same permit number, WAR001168.

Port of Olympia has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2010 Permit and 2015 Permit (collectively, "Permits") with respect to operations of, and discharges of stormwater and pollutants, including unpermitted discharges as described below in Section XII of this Notice of Intent to Sue, from its facility located at or about 915 Washington Street NE, Olympia, WA 98501 (the "facility") as described herein, to the West Bay of Budd Inlet, part of the Puget Sound. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Port of Olympia.

Table 1 – Benchmark Exceedances

Quarter in which sample collected (monitoring point)	COD (Benchmark k 120 mg/L)	TSS (Benchmark 100 mg/L)	Copper Concentration (Benchmark 14 ug/L)	Zinc (Benchmark k 147 ug/L)	Turbidity (Benchmark 25 NTU)
1st Quarter 2011					
A02*					
I01*					
MH1*					
SB1*	870				
SW1*	270				
2nd Quarter 2011					
A02					
I01					
MH1	430	110	20.8		
SB1	150				
SW1					
3rd Quarter 2011					
A02					
I01	420				
MH1	620				64.8
SB1	480			153	
SW1	420			194	36.4
4th Quarter 2011					
A02	245				
I01	1020				
MH1	277				
SB1	560				
SW1	1143	187			
1st Quarter 2012					
A02					
I01	487	287			230
MH1					28.23
SB1	610				84.7
SW1	973	495	26.6	189	308
2nd Quarter 2012					
A02					
I01	430				48.6
MH1	225				69
SB1	460				49.2
SW1	950	196.7		135.7	299.5

2 nd Quarter 2014					
A02					
I01	460				
MH1	290				
SB1	680				130.8
SW1	910				37.1
3 rd Quarter 2014					
A02			14.5	191	33.3
I01	1500	226	15.1	186	208.3
MH1					
SB1	1200			122	68.8
SW1	3250	501.5	39.2	407.5	364.9
4 th Quarter 2014					
A02					
TF1	300				
1 st Quarter 2015					
A02					
TF1	256.67				
2 nd Quarter 2015					
A02					
TF1	180				
3 rd Quarter 2015					
A02	160				
TF1	130				
4 th Quarter 2015					
A02					
TF1	140				
1 st Quarter 2016					
A02					
TF1	270				
2 nd Quarter 2016					
A02					
TF1					
3 rd Quarter 2016					
A02					
TF1	310				
4 th Quarter 2016					
A02					
TF1	640				

* A02, I01, MH1, SB1, SW1, TF1 are monitoring point designations used and known by the Port.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Port of Olympia's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

4. Port of Olympia's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

5. Port of Olympia's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. Port of Olympia's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. Port of Olympia's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present

12. Port of Olympia's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

13. Port of Olympia's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Port of Olympia's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

14. Port of Olympia's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

15. Port of Olympia's SWPPP fails to satisfy the requirements of Condition S3.B.5 Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires Port of Olympia to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Port of Olympia to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls when documented in the SWPPP, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met. The Port of Olympia Facility has at least two distinct points of discharge off-site: outfall A (Monitoring Point A02) and outfall C (Monitoring Point TF1). Additional unnamed distinct discharge points exist, including a number of slot drains and round ports on the dock side of the Facility which discharge directly into Budd Inlet.

Port of Olympia violated these requirements by failing to collect stormwater samples at any of its discharge points during the second quarter of 2016.

Port of Olympia has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. Namely, Port of Olympia does not

and schedule of implementation of the remedial actions that Port of Olympia plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Port of Olympia is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

E. Failure to Comply with Storm Drain Solids Sampling and Reporting Requirements

Condition S6.C.2.d of the 2015 Permit requires that permittees who discharge to Puget Sound Sediment Cleanup Sites remove accumulated solids from storm drain lines owned or controlled by the permittee at least once prior to October 1, 2016. Condition S6.C.2.e of the 2015 Permit requires permittees sample and analyze storm drain solids in accordance with Table 8 of the 2015 Permit at least once prior to October 1, 2016. Condition S6.C.2.f of the 2015 Permit requires that all storm drain solids sampling data shall be reported to Ecology on a Solids Monitoring Report (SMR) no later than the DMR due date for the reporting period in which the solids were sampled, in accordance with Condition S9.A of the 2015 Permit.

Port of Olympia is in violation of these Conditions by failing to remove accumulated solids from storm drain lines at least once prior to October 1, 2016, failing to sample and analyze its storm drain solids at least once prior to October 1, 2016, and failing to report results of storm drain solids sampling to Ecology on an SMR.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements of the Permits.

Condition S8.B of the Permits requires Port of Olympia take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Port of Olympia to: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.3 of the Permits requires Port of Olympia to implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

year 2012; for zinc, COD, turbidity, TSS, and copper triggered by its stormwater sampling during calendar year 2013; for zinc, COD, turbidity, TSS, and copper triggered by its stormwater sampling during calendar year 2014; for COD triggered by its stormwater sampling during calendar year 2015; and for COD triggered by its stormwater sampling during calendar year 2016.

V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires Port of Olympia to submit an accurate and complete annual report to Ecology no later than May 15th of each year. The annual report must include corrective action documentation as required in Condition S8.B – D of the Permits. If a corrective action is not yet completed at the time of submission of the annual report, Port of Olympia must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level One, Two, or Three corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level Two or Three corrective actions triggered during the previous calendar year, including identification of the date Port of Olympia expects to complete corrective actions.

Port of Olympia has violated this condition. The annual report submitted by Port of Olympia for 2012 (in February 2013) does not identify the conditions triggering the need for correction action or describe those problems or the dates they were discovered. The annual report submitted by Port of Olympia for 2013 (in March 2014) does not identify the conditions triggering the need for correction action or describe those problems or the dates they were discovered. The annual report submitted by Port of Olympia for 2014 (in March 2015) does not include the required information. Specifically, Port of Olympia does not provide an adequate description of the Level Three Corrective Action. Additionally, the 2014 annual report does not identify the conditions triggering the need for correction action or describe those problems or the dates they were discovered. The annual report submitted by Port of Olympia for 2015 (in January 2016) does not include the required information. Specifically, Port of Olympia does not provide a date upon which it expects to complete the Level 3 action, instead just stating, “2016.”

VI. EFFLUENT LIMIT VIOLATIONS.

Condition S6.C.1 of the 2015 Permit requires Permittees discharging to a “303(d)-listed” waterbody (Water Quality Category 5), either directly or indirectly through a stormwater drainage system must comply with the applicable sampling requirements and numeric effluent limits in Table 6 of the 2015 Permit. The “applicable sampling requirements and numeric effluent limits” means the sampling and effluent limits in Table 6 that correspond to the specific parameter(s) the receiving was is 303(d)-listed for at the time of permit coverage, or Total Suspended Solids (TSS) if the waterbody is 303(d)-listed for sediment quality at the time of permit coverage. *See also* 2015 Permit Condition S6.C.2.b (Inner Budd Inlet is also a Puget Sound Sediment Cleanup Site, subject to this condition).

grain transfer points, including transfers from inside the warehouse building and from the conveyor belt. Furthermore, grain dust is generated when loaders are cleaned using air hoses. Process wastewater discharges are created when a water truck is used for dust control operations. These prohibited discharges occurred each and every day over the past five years on which Port of Olympia loaded or offloaded grain from ships, transferred grain around the facility, cleaned grain loaders using air hoses, and used water trucks for dust control (which dates are known to the Port of Olympia) and are reasonably likely to continue to occur.

Condition S7.B.3.b of the Permits also requires Port of Olympia to eliminate illicit discharges within 30 days of discovery; and Condition S3.B.4.b.i.7 of the Permits require Port of Olympia's SWPPP to include measures to identify and eliminate illicit discharges to surface waters. Port of Olympia violated these requirements by failing to eliminate its illicit discharges altogether over the last five years and failing to include measure to identify and eliminate illicit discharges in its SWPPP.

Additionally, Condition S7.B.3.a of the Permits requires Port of Olympia to notify the Department of Ecology within seven days of any discovery of an illicit discharge. Port of Olympia violated this requirement by failing to notify Ecology about its illicit discharges within seven days of each occurrence over the past five years.

VIII. MODIFICATION OF PERMIT COVERAGE VIOLATIONS.

Condition S2.B of the Permits requires Port of Olympia to submit a complete Modification of Coverage Form to Ecology when Port of Olympia anticipates a significant process change. This application for modification must be submitted at least 60 days prior to implementing a significant process change. Port of Olympia must complete the public notice requirements in WAC 173-226-130(5) as part a complete application for modification of coverage. And Port of Olympia must comply with the State Environmental Protection Act (SEPA) as part of a complete application for modification of coverage if undergoing a significant process change. Furthermore, general condition G19 requires Port of Olympia to, as soon as possible, give notice to Ecology of planned physical alterations, modification or additions to the permitted industrial activity, which will result in a significant process change. A "significant process change" is defined in the Permits at Appendix 2 as "any modification of the facility that would result in any of the following: (1) Add different pollutants in a significant amount to the discharge, (2) Increase the pollutants in the stormwater discharge by a significant amount, (3) Add a new industrial activity (SIC) that was not previously covered, (4) Add additional impervious surface or acreage such that stormwater discharge would be increased by 25% or more."

Port of Olympia violated condition S2.B and G19 of the Permits by failing to apply for a Modification of Coverage for two significant process changes, including a failure to comply with the public notice requirements and SEPA compliance requirements. These first significant process change at this facility was the initiation of importation and warehousing of corn sometime after the facility obtained Permit coverage and before May 16, 2016. Port of Olympia was required to apply for a Modification of Permit coverage for this process change because the importation or exportation of a new product, in this case, corn, could add different

specified details, within 5 days of the time Port of Olympia became aware of the circumstances unless Ecology requests an earlier submission.

On information and belief, Defendant routinely violates these requirements, including each and every time Port of Olympia exceeded the numeric effluent limitation for TSS, as specified in Table 2, above, each and every time Port of Olympia discharges illicit and/or non-stormwater discharges, as described in section VII to this notice of intent to sue, above, each and every time Port of Olympia failed to comply with the corrective action requirements described in section IV of this Notice of Intent to Sue, and each and every time Port of Olympia discharged stormwater with concentrations of pollutants in excess of the Permit benchmarks, as described in Table 1, above. All these violations may endanger human health or the environment.

XI. VIOLATIONS OF THE RIGHT OF INSPECTION AND ENTRY

General Condition G3 of the Permits requires Port of Olympia to allow an authorized representative of Ecology, upon the presentation of credentials and other such documents: (1) to enter the premises where a discharge is located or where any records shall be kept; (2) to have access to and copy, at reasonable times and at reasonable cost, any records required to be kept under the terms and conditions of the Permit; (3) to inspect, at reasonable times, any facilities, equipment (including sampling and control equipment), practices, methods, or operations regulated or required under the Permit; and (4) to sample or monitor, at reasonable times, any substances or parameters at any location for purposes of assuring permit compliance or as otherwise directed by the CWA.

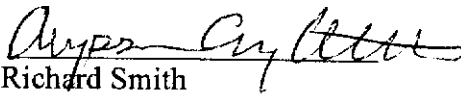
Port of Olympia has violated this condition by denying the right of entry and inspection to Ecology inspectors on the following occasions: January 28, 2015, January 29, 2015, and March 31, 2016. On information and belief, other such denials of access have occurred during the last five years.

XII. UNPERMITTED DISCHARGES

The Permits authorize only the discharges of stormwater and pollutants contained in stormwater. Defendant does not possess and has never possessed an NPDES permit for its non-stormwater direct discharges of grain dust and process wastewater to Budd Inlet. The point sources of illicit discharges of pollutants at Port of Olympia's facility include the clamshell used to load and offload grain from ships, the conveyor belt used to load and offload grain from ships and transfer grain around the facility, grain storage areas, and the facility itself. These point source discharges violate the Clean Water Act's § 301(a), 33 U.S.C. § 1311(a), prohibition on pollutant discharges because they are authorized by no NPDES permit. These violations occurred on March 31, 2016, as well as each and every day over the past five years on which Port of Olympia loaded or offloaded grain from ships, loaded or offloaded grain from trains, transferred grain around the facility, cleaned grain loaders using air hoses, and used water trucks for dust control, which days are known to or discernible by the Port, and are reasonably likely to continue to occur whenever these activities occur going forward.

Very truly yours,

SMITH & LOWNEY, PLLC

By: 
Richard Smith
Alyssa Englebrecht

cc: Scott Pruitt, Administrator, U.S. EPA
Michelle Pirzadeh, Administrator, Region 10 U.S. EPA
Maia Bellon, Director, Washington Department of Ecology

Precipitation Data

2012 Precip.
Accum

Apr Sum

4	0.22 in
5	0.05 in
6	0.03 in
7	0 in
8	0 in
9	0 in
10	0.02 in
11	0.48 in
12	0.03 in
13	0.01 in
14	0 in
15	0.04 in
16	0.4 in
17	0.2 in
18	0.1 in
19	0.69 in
20	0.15 in
21	0 in
22	0 in
23	0 in
24	0.07 in
25	0.67 in
26	0.23 in
27	0.06 in
28	0 in

29 0.08 in

30 0.28 in

2012 Precip.
Accum.

May Sum

1	0.13 in
2	0 in
3	0.79 in
4	0.01 in
5	0 in
6	0 in
7	0 in
8	0 in
9	0 in
10	0 in
14	0 in
15	0 in
16	0 in
17	0 in
18	0 in
19	0 in
20	0.16 in
21	0.25 in
22	0.39 in
23	0.34 in
24	0.12 in
25	0 in
26	0 in

27 0 in

28 0.02 in

29 0 in

30 0 in

31 0.28 in

2012 Precip.
Accum.

Jun Sum

1	0.11 in
2	0.03 in
3	0 in
4	0.03 in
5	0.1 in
6	0 in
7	0.55 in
8	0.15 in
9	0 in
10	0 in
11	0 in
12	0.01 in
13	0.01 in
14	0 in
15	0 in
16	0 in
17	0.03 in
18	0.03 in
19	0 in
20	0 in

Precipitation Data

6	0 in	2	0 in	2012	Precip. Accum.
7	0 in	3	0 in		
8	0 in	4	0 in	Nov	Sum
9	0 in	5	0 in	1	0.42 in
10	0 in	6	0 in	2	0.2 in
11	0 in	7	0 in	3	0.05 in
12	0 in	8	0 in	4	0.12 in
13	0 in	9	0 in	5	0.01 in
14	0 in	10	0 in	6	0.01 in
15	0 in	12	0.14 in	7	0.01 in
16	0 in	13	0.31 in	8	0 in
17	0 in	14	0.52 in	9	0.01 in
18	0 in	15	0.33 in	10	0.01 in
19	0 in	16	0.16 in	11	0.83 in
20	0 in	17	0 in	12	0.27 in
21	0 in	18	0.42 in	13	0.12 in
22	0 in	19	0.14 in	14	0.02 in
24	0 in	20	0.2 in	15	0 in
25	0 in	21	0.24 in	16	0.2 in
26	0 in	22	0.3 in	17	0.31 in
27	0 in	23	0.01 in	18	0.62 in
28	0 in	24	0.18 in	19	2.16 in
29	0 in	25	0.02 in	20	0.33 in
30	0 in	26	0.11 in	21	0.61 in
		27	0.56 in	22	0.05 in
2012	Precip. Accum.	28	0.3 in	23	0.56 in
Oct	Sum	29	0.45 in	24	0 in
1	0 in	30	1.63 in	25	0 in
		31	1.06 in		

Precipitation Data

10	0 in	7	0.27 in	1	0 in
11	0.03 in	8	0 in	2	0 in
12	0.02 in	9	0 in	3	0 in
13	0.02 in	10	0.04 in	4	0.39 in
14	0.01 in	11	0.15 in	5	0.85 in
15	0 in	12	0.2 in	6	0.45 in
16	0.02 in	13	0.21 in	7	0.67 in
17	0 in	14	0 in	8	0 in
18	0.02 in	15	0.04 in	9	0 in
19	0.02 in	16	0.18 in	10	0.36 in
20	0.1 in	17	0.02 in	11	0 in
21	0.18 in	18	0.06 in	12	0.18 in
22	1.6 in	19	0.43 in	13	0.23 in
23	0.03 in	20	0.79 in	14	0.24 in
24	0.02 in	21	0.15 in	15	0.03 in
25	0.43 in	22	0 in	16	0.01 in
26	0.02 in	23	0 in	17	0 in
27	0.13 in	24	0 in	18	0.02 in
28	0.68 in	25	0 in	19	0.24 in
2013	Precip. Accum.	26	0.01 in	20	0 in
		27	0.01 in	21	0.08 in
Mar	Sum	28	0.22 in	22	0.01 in
1	0.04 in	29	0 in	23	0 in
2	0.04 in	30	0 in	24	0 in
3	0 in	31	0 in	25	0 in
4	0 in			26	0 in
5	0.16 in	2013	Precip. Accum.	27	0 in
6	0.31 in	Apr	Sum	28	0.17 in
				29	0.02 in

Precipitation Data

14	0 in	8	0 in	2	0.01 in
15	0 in	9	0 in	3	0.42 in
16	0 in	10	0.07 in	4	0 in
17	0 in	11	0 in	5	0 in
18	0 in	12	0 in	6	0.38 in
19	0 in	13	0 in	7	0 in
20	0 in	14	0.07 in	8	0.01 in
21	0 in	15	0.08 in	9	0 in
22	0 in	16	0 in	10	0 in
23	0 in	17	0 in	11	0 in
24	0 in	18	0 in	12	0 in
25	0 in	19	0 in	13	0 in
26	0 in	20	0 in	14	0 in
27	0 in	21	0 in	15	0.09 in
28	0 in	22	0 in	16	0.02 in
29	0 in	23	0 in	17	0.46 in
30	0 in	24	0.02 in	18	0.01 in
31	0 in	25	0 in	19	0 in
		26	0.05 in	20	0.14 in
2013	Precip. Accum.	27	0.03 in	21	0 in
		28	0.11 in	22	1.13 in
Aug	Sum	29	0.66 in	23	0.5 in
1	0 in	30	0 in	24	0.57 in
2	0.01 in	31	0 in	25	0.04 in
3	0 in			26	0 in
4	0.01 in	2013	Precip. Accum.	27	0.17 in
5	0 in			28	2.37 in
6	0 in	Sep	Sum	29	0.87 in
7	0 in	1	0 in	30	1.13 in

Precipitation Data

19	0 in	13	0.07 in	7	0 in
20	0.17 in	14	0 in	8	0 in
21	0.06 in	15	0 in	9	0.28 in
22	0.02 in	16	0 in	10	0.43 in
23	0.22 in	17	0 in	11	0.87 in
24	0 in	18	0 in	12	0.53 in
25	0 in	19	0.01 in	13	0.09 in
26	0 in	20	0 in	14	0.54 in
27	0.01 in	21	0 in	15	0.66 in
28	0 in	22	0.02 in	16	0.93 in
29	0 in	23	0 in	17	0.86 in
30	0 in	24	0 in	18	0.91 in
31	0.06 in	25	0.01 in	19	0.37 in
2014	Precip. Accum.	26	0.01 in	20	0.33 in
Jan	Sum	27	0.01 in	21	0.02 in
1	0.01 in	28	0.48 in	22	0 in
2	0.14 in	29	0.35 in	23	0.2 in
3	0 in	30	0.13 in	24	0.76 in
4	0.01 in	31	0.05 in	25	0 in
5	0.01 in	2014	Precip. Accum.	26	0 in
6	0.2 in	Feb	Sum	27	0 in
7	0.23 in	1	0.05 in	28	0 in
8	0.49 in	2	0 in	2014	Precip. Accum.
9	0.37 in	3	0 in	Mar	Sum
10	0.53 in	4	0 in	1	0 in
11	1.54 in	5	0 in	2	0.6 in
12	0.23 in	6	0 in	3	0.43 in

Precipitation Data

25	0.29 in	19	0 in	14	0 in
26	0 in	20	0 in	15	0 in
27	0.03 in	21	0 in	16	0 in
28	0 in	22	0 in	17	0 in
29	0 in	23	0.04 in	18	0 in
30	0 in	24	0 in	19	0 in
31	0 in	25	0 in	20	0 in
2014	Precip. Accum.	26	0.01 in	21	0 in
Jun	Sum	27	0.33 in	22	0 in
1	0 in	28	0.11 in	23	0.24 in
2	0 in	29	0 in	24	0 in
3	0 in	30	0 in	25	0 in
4	0 in	2014	Precip. Accum.	26	0 in
5	0 in	Jul	Sum	27	0 in
6	0 in	1	0 in	28	0 in
7	0 in	2	0 in	29	0 in
8	0 in	3	0 in	30	0 in
9	0 in	4	0 in	31	0 in
10	0 in	5	0 in	2014	Precip. Accum.
11	0 in	6	0 in	Aug	Sum
12	0.31 in	7	0 in	1	0 in
13	0.07 in	8	0 in	2	0 in
14	0 in	9	0 in	3	0 in
15	0.02 in	10	0 in	4	0 in
16	0.03 in	11	0 in	5	0 in
17	0 in	12	0 in	6	0 in
18	0 in	13	0 in	7	0 in

Precipitation Data

27	0.11 in	21	0.89 in	16	0.03 in
28	0.1 in	22	0.36 in	17	0.07 in
29	0.05 in	23	0.43 in	18	0.45 in
30	0.08 in	24	0.23 in	19	0.07 in
31	0.08 in	25	0.62 in	20	1.71 in
2014	Precip. Accum.	26	0.1 in	21	0.36 in
Nov	Sum	27	0.23 in	22	0 in
1	0.07 in	28	0.2 in	23	0.38 in
2	0.06 in	29	0.07 in	24	0.2 in
3	0.07 in	30	0.05 in	25	0 in
4	0.04 in	2014	Precip. Accum.	26	0 in
5	0.05 in	Dec	Sum	27	0.28 in
6	0.06 in	1	0.14 in	28	0.06 in
7	0.04 in	2	0.25 in	29	0.24 in
8	0.04 in	3	0 in	30	0 in
9	0.04 in	4	0.01 in	31	0 in
10	0.03 in	5	0.13 in	2015	Precip. Accum.
11	0.02 in	6	0.18 in	Jan	Sum
12	0.04 in	7	0.01 in	1	0 in
13	0.01 in	8	0.23 in	2	0.03 in
14	0.36 in	9	0.58 in	3	0 in
15	0.8 in	10	0.53 in	4	1.94 in
16	0.22 in	11	0.29 in	5	0.91 in
17	0.05 in	12	0.24 in	6	0 in
18	0 in	13	0 in	7	0.01 in
19	0.01 in	14	0.01 in	8	0 in
20	0.03 in	15	0.01 in	9	0 in

Precipitation Data

30	0.04 in	24	0.3 in	19	0 in
31	0.2 in	25	0.04 in	20	0 in
2015	Precip. Accum.	26	0.01 in	21	0 in
Apr	Sum	27	0.01 in	22	0.05 in
1	0.03 in	28	0 in	23	0 in
2	0 in	29	0.13 in	24	0 in
3	0.18 in	30	0 in	25	0 in
4	0 in	2015	Precip. Accum.	26	0 in
5	0 in	May	Sum	27	0 in
6	0 in	1	0 in	28	0 in
7	0.08 in	2	0 in	29	0 in
8	0 in	3	0 in	30	0 in
9	0 in	4	0 in	31	0 in
10	0.57 in	5	0.15 in	2015	Precip. Accum.
11	0.08 in	6	0 in	Jun	Sum
12	0.01 in	7	0 in	1	0.14 in
13	0.13 in	8	0 in	2	0 in
14	0.06 in	9	0 in	3	0 in
15	0 in	10	0 in	4	0 in
16	0 in	11	0.01 in	5	0 in
17	0 in	12	0.21 in	6	0 in
18	0 in	13	0.14 in	7	0 in
19	0 in	14	0.01 in	8	0 in
20	0 in	15	0 in	9	0 in
21	0 in	16	0 in	10	0 in
22	0 in	17	0 in	11	0 in
23	0.12 in	18	0 in	12	0 in

Precipitation Data

31	0.02 in	29	0 in	21	0.01 in
2015	Precip. Accum.	30	0 in	22	0 in
Sep	Sum	2015	Precip. Accum.	23	0.11 in
1	0.02 in	Oct	Sum	24	0.18 in
2	0.02 in	1	0 in	25	0 in
3	0.02 in	2	0.03 in	26	0 in
4	0.01 in	3	0 in	27	0.01 in
5	0.01 in	4	0 in	28	0.01 in
6	0.02 in	5	0 in	29	0.01 in
7	0.01 in	6	0 in	30	0.01 in
8	0.01 in	3	0 in	2015	Precip. Accum.
9	0.02 in	4	0.04 in	Dec	Sum
10	0 in	5	0.06 in	1	0.71 in
11	0.01 in	6	0 in	2	0.06 in
12	0.01 in	7	0.38 in	3	0.42 in
13	0 in	8	0.18 in	4	0.24 in
14	0.01 in	9	0.01 in	5	0.32 in
15	0 in	10	0.07 in	6	0.43 in
16	0.01 in	11	0.16 in	7	0.72 in
17	0 in	12	1.01 in	8	1.68 in
18	0 in	13	1.63 in	9	0.41 in
19	0.01 in	15	0.48 in	10	0.88 in
20	0 in	16	0.79 in	11	0.13 in
21	0 in	17	1.53 in	12	0.64 in
22	0.01 in	18	0.11 in	13	0.25 in
23	0.4 in	19	0.07 in	14	0 in
24	0 in	20	0.01 in	15	0 in

Precipitation Data

Mar	Sum	29	0 in	23	0.03 in
1	1.43 in	30	0 in	24	0.07 in
2	0.23 in	31	0 in	25	0 in
3	0.11 in	2016	Precip. Accum.	26	0 in
4	0.22 in			27	0 in
5	0.21 in	Apr	Sum	28	0 in
6	0.69 in	1	0 in	29	0.02 in
7	0.31 in	2	0 in	30	0 in
8	0.12 in	3	0.22 in	2016	Precip. Accum.
9	1.18 in	4	0.17 in		
10	0.44 in	5	0.01 in	May	Sum
11	0.26 in	6	0 in	1	0 in
12	0.29 in	7	0 in	2	0 in
13	0.43 in	8	0 in	3	0 in
14	0.62 in	9	0 in	4	0.01 in
15	0.07 in	10	0 in	5	0 in
16	0 in	11	0 in	6	0 in
17	0 in	12	0.45 in	7	0 in
18	0 in	13	0.23 in	8	0 in
19	0 in	14	0.14 in	9	0.01 in
20	0.31 in	15	0.01 in	10	0 in
21	0.43 in	16	0 in	11	0 in
22	0.05 in	17	0 in	12	0 in
23	0.29 in	18	0 in	13	0 in
24	0.32 in	19	0 in	14	0 in
25	0 in	20	0 in	15	0.01 in
26	0.26 in	21	0 in	16	0 in
27	0.1 in	22	0.25 in	17	0 in
28	0 in				

Precipitation Data

1	0 in	31	0.12 in	25	0 in
2	0 in	2016	Precip.	26	0 in
3	0 in		Accum.	27	0.01 in
4	0 in	Sep	Sum	28	0 in
5	0 in	1	0.34 in	29	0 in
6	0 in	2	0.03 in	30	0 in
7	0.13 in	3	0 in	2016	Precip.
8	0 in	4	0.03 in		Accum.
9	0 in	5	0.04 in	Oct	Sum
10	0 in	6	0.3 in	1	0.2 in
11	0 in	7	0 in	2	0.1 in
12	0 in	8	0 in	3	0.02 in
13	0 in	9	0 in	4	0.23 in
14	0 in	10	0 in	5	0.16 in
15	0 in	11	0 in	6	0.33 in
16	0 in	12	0 in	7	0.43 in
17	0 in	13	0 in	8	0.58 in
18	0 in	14	0 in	9	0.3 in
19	0 in	15	0 in	10	0 in
20	0 in	16	0 in	11	0 in
21	0 in	17	0.34 in	12	0.05 in
22	0 in	18	0.01 in	13	1.69 in
23	0 in	19	0.18 in	14	1.64 in
24	0 in	20	0 in	15	0.77 in
25	0 in	21	0.01 in	16	0.76 in
26	0 in	22	0 in	17	0.44 in
27	0 in	23	0.28 in	18	0.2 in
29	0 in	24	0 in	19	0.42 in
30	0 in				

Precipitation Data

3	0 in	2017	Precip.	26	0.4 in
4	0 in		Accum.	27	0.13 in
5	0 in	Feb	Sum	28	0.07 in
6	0 in	1	0 in	2017	Precip.
7	0 in	2	0.02 in		Accum.
8	0.61 in	3	0.56 in	Mar	Sum
9	0.05 in	4	0.87 in	1	0.14 in
10	0.3 in	5	0.38 in	2	0.46 in
11	0 in	6	0.67 in	3	1.03 in
12	0 in	7	0.01 in	4	0.32 in
13	0 in	8	0.95 in	5	0.22 in
14	0 in	9	1.29 in	6	0.23 in
15	0 in	10	0.2 in	7	0.74 in
16	0 in	11	0.01 in	8	0.27 in
17	1.16 in	12	0.01 in	9	1.01 in
18	0.69 in	13	0 in	10	0.05 in
19	0.15 in	14	0.49 in	11	0.41 in
20	0.04 in	15	1.32 in	12	0.01 in
21	0.18 in	16	0.12 in	13	0.45 in
22	0.06 in	17	0.02 in	14	0.87 in
23	0 in	18	0.36 in	15	0.68 in
24	0 in	19	0.27 in	16	0.01 in
25	0 in	20	0.26 in	17	1.01 in
26	0 in	21	0.13 in	18	0.42 in
27	0 in	22	0 in	19	0 in
28	0 in	23	0.16 in	20	0.09 in
29	0.02 in	24	0 in	21	0.15 in
30	0 in	25	0.01 in	22	0.23 in
31	0 in				

Precipitation Data

23	0.43 in
24	0.42 in
25	0.09 in
26	0.53 in
27	0.03 in
28	0.54 in
29	0.71 in
30	0.06 in
31	0 in

2017	Precip. Accum.
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Apr	Sum
1	0.01 in
2	0 in
3	0 in